

Leslie A. Hall

45 East Church lane

Apt. 3front

Philadelphia, PA 19144

267-581-6499

19 5060

against *VS.*

*Complaint
(No jury trial)*

Horizon House

120 S 30th street

Philadelphia, PA 19104

215 386-3838

Dr. P. Pandya

Curtis Frazier

Debra Oladinni

FILED

OCT 28 2019

KATE BARKMAN, Clerk
By JL Dep. Clerk

II. Basis for Jurisdiction

Diversity of Citizenship

Plaintiff state of citizenship American

Defendant state of Citizenship Indian and American

The event occurred in Philadelphia @Horizon House

Dates event occurred June 2019 June 20th-June 26

Horizon House failed to administer psychotropic medication to me in June 2019; leading to a psychotropic meltdown.

Horizon House failed to administer psychotropic medication to me in June 2019 leading to a psychotropic meltdown. Horizon's House Dr. Pandya violated my civil rights by failing to refill my medication and was unavailable until July 23, 2019. His staff members Curtis Fraizer (case manager supervisor) and case manager Debra Oladini were completely negligent in honoring my frantic requests for (refills) medication.

After an initial meeting with Dr. Pandya in April 2019, He filled my prescriptions. In June, I contacted case manager Debra Oladini that I was running out and I needed refills the following week. On June 22 I ran out and called Debra and she told me they would be delivered to Horizon House the following day. The next day, she informed me that Dr. Pandya didn't have my medication prescriptions and that I would have to wait. The third day, I began to hear voices and became paranoid and experiencing psychotic flashbacks. I called Ganz apothecary and was told that they have no refills on file from Dr. Pandya. I then called my old mental health provider (Project Transition) and spoke to Dr. Sakar. Dr. Sakar told me that he could no longer fill my prescriptions. I notified my new therapist Gabby and that I was psychotic. She saw me and said I need meds ASAP. I spoke to Curtis Fraizer and he said it would be delivered "the next day". In the interim, My family took me to Chestnut Hill hospital and they told me that they cannot administer such heavy medication. They referred me to the Germantown Crisis Center. In a last ditch effort, I called my primary care physician Dr. Schiffman and her colleague Dr. Farben called my meds into Walgreens.

Injuries

I saw and heard things that caused me trauma.

Relief

Due to the harrowing experience of gross negligence exhibited by Horizon House I am requesting compensation of five million dollars to remedy my suffering and deceitful actions and denying me my civil rights and enjoyment of life.

- B List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Federal - Human & Civil Rights

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship America

Defendant(s) state(s) of citizenship Indian / American

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Philadelphia County

123 E. GORGAS Lane - Philadelphia PA 19119

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

C. Facts: _____

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

I declare under penalty of perjury that the foregoing is true and correct.

Signed this ____ day of _____, 20__.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

Leslie M. Hall
45 East Church Lane
Apt 302 Front
Philadelphia, PA 19144
267.581.6499
lesliehall101@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this ____ day of _____, 20__, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____